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5 San Francisco, California 94111  
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7 Facsimile: (415) 398-0911

8 Attorneys for Plaintiff  
9 NORCA INDUSTRIAL, LLC

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12  
13 NORCA INDUSTRIAL, LLC, a New York  
14 Limited Liability Company,

15 Plaintiff,

16 v.

17 ROBERT WREN, an individual; PRIMROSE  
18 METALS, INC., a California corporation;  
19 RICHARD RAYBIN, an individual; LIFETIME  
20 CAPITAL GROUP, an unknown entity;  
21 VICTORIA PICOLOTTI, an individual;

22 Defendants.

CASE NO. C 07 3425 EDL

**DECLARATION OF COUNSEL  
IN SUPPORT OF PLAINTIFF'S  
EX PARTE APPLICATION FOR  
TEMPORARY RESTRAINING  
ORDER, PRELIMINARY  
INJUNCTION AND EXPEDITED  
DISCOVERY**

Date: July 2, 2007

Time: 10:00 a.m.

Room: Clerk's Office, 16th Flr.

23 R. SCOTT ERLEWINE declares:

24 1. I am a member of Phillips, Erlewine & Given LLP, counsel for defendant Norca  
25 Industrial LLC (hererafter "Norca") in this action. The facts set forth in this declaration are  
26 based upon my personal knowledge, except where stated to be on information and belief, and as  
27 to those, I believe it to be true.  
28

1           2.       Within the past week, I visited the www.networksolutions.org internet website,  
2 and clicked onto the "WHOIS" page. In my experience, this page permits someone to search out  
3 the registration and contact information for a website by typing in its internet domain address. I  
4 typed in the internet domain address "primrosemets.com." Attached hereto as exhibit A is a  
5 true and correct copy of the result of that search inquiry. It states that "Lifetime Capital Group"  
6 is the registrant and contact person for primrosemets.com. It also states that the domain was  
7 registered on June 6, 2007.

8           3.       I then conducted a Google search for "Lifetime Capital Group." The search  
9 disclosed a listing for Richard Raybin at linkedin.com. I clicked on that link, which called up a  
10 page devoted to Richard Raybin. Attached hereto as Exhibit B are true and correct copies of that  
11 search result and the linked page. Exhibit B lists Mr. Raybin as a principal of Lifetime Capital  
12 Group. It also lists Mr. Raybin as being associated with a entity named "Front Line Consulting  
13 Group." Based on the foregoing, I am informed and believe that the internet address  
14 "rreybin@flcg.com" (as appearing in several of the e-mails attached to Mr. Bahar's declaration  
15 submitted herewith) is for Richard Raybin at Front Line Consulting Group.

16           4.       I also conducted an online Westlaw search for the corporate registration of  
17 Primrose Metal, Inc. Attached hereto as Exhibit C is a true and correct copy of that search result.

18           I declare under penalty of perjury under the laws of the United States of America that the  
19 foregoing is true and correct.

20 Executed on: June 29, 2007

21   
R. Scott Erlewine

NetworkSolutions.

Login

Your cart

## WHOIS Search Results

### WHOIS Record For



**primrosemetals.com**

Services from Network Solutions:

Certified Offer Service - Let us help you get this domain name!  
Backorder - Try to get this name when it becomes available.  
SSL Certificates - Get peace of mind with a secure certificate.



Let us take you to the top of the major search engines

**Guaranteed top ten placement**

Choose Your Domain Provider Wisely and Domains for \$9.99/yr

Maximize Results from Commerce Store: Do our 8 Steps to Success Selling Online

Visit AboutUs.org for more information about PRIMROSEMETALS.COM AboutUs:  
PRIMROSEMETALS.COM

#### Registrant:

Lifetime Capital Group  
ATTN: PRIMROSEMETALS.COM  
c/o Network Solutions  
P.O. Box 447  
Herndon, VA 20172-0447

**Domain Name:** PRIMROSEMETALS.COM

#### Administrative Contact :

Lifetime Capital Group  
xu7mp6pq7du@networksolutionsprivateregistration.com  
ATTN: PRIMROSEMETALS.COM  
c/o Network Solutions  
P.O. Box 447  
Herndon, VA 20172-0447  
Phone: 570-708-8780

#### Technical Contact :

Lifetime Capital Group  
xu7mp6pq7du@networksolutionsprivateregistration.com  
ATTN: PRIMROSEMETALS.COM  
c/o Network Solutions

See

EXHIBIT A

P.O. Box 447  
Herndon, VA 20172-0447  
Phone: 570-708-8780

Record expires on 06-Jun-2008  
Record created on 06-Jun-2007  
Database last updated on 06-Jun-2007

**Domain servers in listed order:**

NS87.WORLDDNIC.COM  
NS88.WORLDDNIC.COM

Manage DNS

205.178.190.44  
205.178.189.44

This listing is a Network Solutions Private Registration. Mail correspondence to this address must be sent via USPS Express Mail™ or USPS Certified Mail®; all other mail will not be processed. Be sure to include the registrant's domain name in the address.

Show underlying registry data for this record

**Current Registrar:** NETWORK SOLUTIONS, LLC.  
**IP Address:** 205.178.145.65 (ARIN & RIPE IP search)  
**IP Location:** US(UNITED STATES)-KANSAS-FT. LEAVENWORTH  
**Lock Status:** clientTransferProhibited  
**DMOZ** no listings  
**Y! Directory:** see listings  
**Data as of:** 14-Jun-2005

**BUY THE AVAILABLE  
EXTENSIONS  
FOR THIS DOMAIN NA**

primrosemet... ☒ .or  
primrosemet... ☒ .in  
primrosemet... ☒ .m  
primrosemet... ☒ .bi  
primrosemet... ☒ .tv  
primrosemet... ☒ .us  
primrosemet... ☒ .cc  
primrosemet... ☒ .w  
primrosemet... ☒ .bz  
primrosemet... ☒ .vc  
primrosemet... ☒ .gs  
primrosemet... ☒ .tc  
primrosemet... ☒ .m

**Continue** >

**SEARCH AGAIN**

e.g. networksolutions.co

Search by:

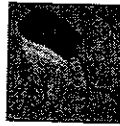
- ☒ Domain Name  
☐ NIC Handle  
☐ IP Address



**Need to get your business online?**

Our professional designers can build a custom Web site for your business.

\$11.95/month, plus a \$499.00 design fee

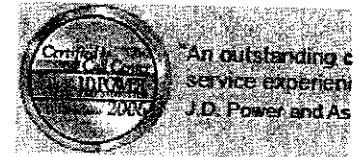


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Sign in

Google

"lifetime capital group"

Search

Advanced Search  
Preferences

Web

Results 1 - 2 of 2 for "lifetime capital group". (0.06 seconds)

Tip: Try removing quotes from your search to get more results.

LinkedIn: Rick Raybin

Managing Director at **Lifetime Capital Group ... Lifetime Capital Group**. (Privately Held;  
1-10 employees; Investment Management industry) ...  
www.linkedin.com/in/r/raybin - 17k - Cached - Similar pages

LinkedIn Directory

Current: Managing Director, **Lifetime Capital Group**. Past: Principal at Front Line  
Consulting Group Consultant at Richard A Raybin & Associates ...  
www.linkedin.com/find/in/r/r85.html - 27k - Cached - Similar pages  
[ More results from www.linkedin.com ]

*In order to show you the most relevant results, we have omitted some entries very similar to  
the 2 already displayed.  
If you like, you can repeat the search with the omitted results included.*

Try Google Desktop: search your computer as easily as you search the web.

"lifetime capital group"

Search

Search within results | Language Tools | Search Tips | Dissatisfied? Help us improve

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EXHIBIT B

This is Google's cache of <http://www.linkedin.com/in/raybin> as retrieved on Jun 15, 2007 06:14:55 GMT. Google's cache is the snapshot that we took of the page as we crawled the web. The page may have changed since that time. Click here for the current page without highlighting. This cached page may reference images which are no longer available. Click here for the cached text only. To link to or bookmark this page, use the following url: [http://www.google.com/search?q=cache:G4\\_Mc5MaIVoJ:www.linkedin.com/in/raybin+%22lifetime+capital+group%22&hl=en&ct=clnk&cd=1&gl=us](http://www.google.com/search?q=cache:G4_Mc5MaIVoJ:www.linkedin.com/in/raybin+%22lifetime+capital+group%22&hl=en&ct=clnk&cd=1&gl=us)

Google is neither affiliated with the authors of this page nor responsible for its content.

These search terms have been highlighted: **lifetime capital group**

## Rick Raybin

Financial Advisor

San Francisco Bay Area

- Current**
  - **Managing Director at Lifetime Capital Group**
- Past**
  - Principal at Front Line Consulting Group
  - Consultant at Richard A Raybin & Associates (Self-employed)
  - CFO at The RREEF Funds
- Education**
  - Columbia University - Columbia Business School
  - Bowdoin College
- Connections** 13 connections
- Industry** Investment Management
- Websites**
  - [My Company](#)

## Rick Raybin's Summary

My mission is to have a huge positive impact on the people I work with by helping them enjoy the financial security that frees them to fulfill their dreams in a way that engenders trust, confidence and peace of mind.

Helping individuals create comprehensive financial strategies based on what is truly important to them is one of the most important aspects of my business. Helping them succeed by motivating and encouraging them to fulfill their dreams is another. And I free them from time consuming distractions by implementing their strategies.

I embrace the duty of putting their interests first, to act in good faith and with care, candor, and loyalty in helping them.

Building on this foundation, I work with leading experts in key financial disciplines, including world renown investment scientists to provide investment programs that have a demonstrated track record of outstanding performance; nationally recognized estate and tax planning experts; risk management experts, CPAs and estate attorneys.

Beginning as a CPA with Coopers & Lybrand (now PriceWaterhouseCoopers) and working as the Chief Financial Officer of an investment advisor to many of the largest pension plans in the US, I have a deep understanding of finance, financial strategies and the most effective investment programs.

**Rick Raybin's Specialties:**



investment strategies based on state-of-the-art investment research by leading financial economists, financial and estate planning, wealth management

## **Rick Raybin's Experience**

### **Managing Director**

#### **Lifetime Capital Group**

(Privately Held; 1-10 employees; Investment Management industry)

April 2006 — Present (1 year 3 months)

Help clients enjoy peace of mind and financial security throughout their lives by providing them with prudent financial strategies including financial planning and customized investment portfolios and advice on related financial products

### **Principal**

#### **Front Line Consulting Group**

(Privately Held; 1-10 employees; Financial Services industry)

October 1996 — March 2004 (7 years 6 months)

Strategic planning and consulting on financial operations, reporting and information systems to private companies

### **Consultant**

#### **Richard A Raybin & Associates (Self-employed)**

(Self-Employed; Myself Only; Financial Services industry)

September 1990 — September 1996 (6 years 1 month)

Strategic Planning, Interim CFO and other consulting services to privately held companies

### **CFO**

#### **The RREEF Funds**

(Privately Held; 201-500 employees; Investment Management industry)

April 1979 — June 1990 (11 years 3 months)

Responsible for all aspects of financial management, investor reporting and information systems

Liaison to industry groups, including founding and Chmn of National Council of Real Estate Fiduciaries (NCREIF)  
1982 - 1984

## **Rick Raybin's Education**

### **Columbia University - Columbia Business School**

MBA, Finance, Accounting, 1973 — 1975

### **Bowdoin College**

AB, Economics, 1969 — 1973

*Activities and Societies:* Tennis Team, DKE

## **Additional Information**



**Rick Raybin's Websites:**

My Company

**Rick Raybin's Interests:**

competitive tennis, travel, family & good friends

**Rick Raybin's Honors:**

Chairman of National Council of Real Estate Investment Fiduciaries, Treasurer of Friends of SF Public Library, VP Finance of Hillsborough Schools Foundation

Westlaw

CA03001425

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CA03001425

**CORPORATE RECORDS & BUSINESS REGISTRATIONS**

This Record Last Updated: 06/19/2007  
Database Last Updated: 06-19-2007  
Update Frequency: WEEKLY  
Current Date: 06/20/2007  
Source: AS REPORTED BY THE SECRETARY OF STATE OR OTHER OFFICIAL  
SOURCE

THIS DATA IS FOR INFORMATION PURPOSES ONLY. CERTIFICATION CAN ONLY BE OBTAINED  
THROUGH THE SACRAMENTO OFFICE OF THE CALIFORNIA SECRETARY OF STATE.

**COMPANY INFORMATION**

Name: PRIMROSE METALS, INC.  
Care of Name: CARR & FERRELL  
Address: 2200 GENG ROAD  
PALO ALTO, CA 94303

**FILING INFORMATION**

Identification Number: C3001425  
Filing Date: 06/08/2007  
State of Incorporation: CALIFORNIA  
Status: ACTIVE  
Corporation Type: PROFIT  
Business Type: CORPORATION  
Where Filed: SECRETARY OF STATE/CORPORATIONS DIVISION  
1500-11TH STREET  
SACRAMENTO, CA 95814

**REGISTERED AGENT INFORMATION**

Name: NEAL M WILLIAMS

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**EXHIBIT C**

CA03001425

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Address: 2200 GENG ROAD STE 101  
PALO ALTO, CA 94303

**TAX INFORMATION**

Franchise Tax Details:

Status: GOOD STANDING

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)  
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